

REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 1, 2, and 4 through 10 are pending, with Claims 1, 9, and 10 being independent.

Claims 1, 2, and 4 through 10 were rejected under 35 U.S.C. § 102(e) over U.S. Patent No. 6,484,195 B1 (Igarashi, et al.). All rejections are respectfully traversed.

Claims 1, 9, and 10 variously recite, inter alia, designating an image among the plurality of images in the document information to be changed by an image newly stored in the image storage unit or step, and creating new document information by substituting the designated image in the document information by the image stored in the image storage unit or step.

However, Applicants respectfully submit that Igarashi, et al. fails to disclose or suggest at least the above-discussed combinations of claimed features as recited, inter alia, in Claims 1, 9, and 10.

In this regard, the Official Action states at page 3 that the designating is shown at Igarashi, et al.'s col. 11, lines 47 through 53, and the creating/substituting is shown at Igarashi, et al.'s col. 5, lines 10 through 35. This statement is respectfully traversed. Applicants respectfully submit that the first cited section discloses, e.g., that if the designated image format is "mpg", a plurality of image data registered with the same reservation code are read, then the images are compressed by the compressor 2021, and the compressed moving image data are returned via the interface unit 1011 to the external device 1002. And Applicants respectfully submit that the second cited section discloses, e.g., that an HTML document is generated with image-data description, along with storing obtained image data in the designated format, and when an image

read command is sent from the external device 1002, image data is read from the memory 1019. However, Applicants respectfully submit that neither the foregoing nor the remainder of Igarashi, et al. provides either a description or suggestion of the above-discussed combinations of claimed features, including substituting the designated image by the stored image. And contrary to the assertion at pages 5 and 6 of the Official Action, both the previous response and the current response are in full compliance with 37 C.F.R. § 1.111, since Applicants have specifically identified claimed features not shown in the cited document. Favorable consideration in this regard is earnestly solicited.

Furthermore, Applicants respectfully submit that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at the above-discussed combinations of claimed features.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

This Amendment After Final Rejection is an earnest attempt to advance prosecution and reduce the number of issues, and is believed to clearly place this application in condition for allowance. Furthermore, Applicants respectfully submit that a full appreciation of these amendments will not require undue time or effort given the Examiner's familiarity with this application. Moreover, this Amendment was not earlier presented because Applicants earnestly believed that the prior Amendment placed the subject application in condition for allowance. Accordingly, entry of this Amendment under 37 C.F.R. § 1.116 is respectfully requested.

Applicants submit that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,



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